

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

MARIA JOSE PIZARRO	Petitioner	Index
v.		
SANTIAGO QUEZADA	Respondent	<u>VERIFIED PETITION</u>

Petitioner Maria Jose Pizarro (“Maria”) as and for her CPLR 5206(e) petition against respondent Santiago Quezada (“Mr. Quezada”), hereby states:

1. Maria is a judgment creditor of Mr. Quezada. She prevailed following a four-day jury trial on Title VII and state/city law claims based on his “decades-long and worsening pattern of physical and verbal harassment by Quezada, of groping and pinching, of exposure of private parts and masturbation in front of her, and an attempted rape.” *Pizarro v. Euros El Tina Restaurant Lounge and Billiards Corp.*, 2024 WL 837572, at *3 (S.D.N.Y. Feb. 27, 2024).

2. The jury awarded \$1.625 million in damages against him. *Id.* at *1.

3. The resulting Federal judgment (Exhibit 1) has been docketed (Exhibit 2) in Westchester County.

4. No portion of the judgment has been paid or satisfied.

5. On May 14, 2025, Mr. Quezada commenced a bankruptcy case to stay enforcement. In his bankruptcy petition (Exhibit 3), he represented that he lives at 258 Rumsey Road, Yonkers, NY 10705 (“258 Rumsey Road”) (Item 5) and that over the last 180 days, he lived in that district longer than in any other district.

6. Yonkers real property records (Exhibits 4-5) confirm that he is the sole owner of 258 Rumsey Road and has owned the property since 2000.

7. Mr. Quezada’s bankruptcy schedules (Exhibit 6, certified by him at PDF p.31) likewise state he is the sole owner of 258 Rumsey Road, and that the property is valued by him at

around \$700,000 (Schedule A/B Item 1.1, PDF p.9) as of the commencement of the bankruptcy case. The bankruptcy schedules also state (Schedule D, PDF p.18) that there is no mortgage debt on the property.

8. Mr. Quezada's bankruptcy case was dismissed (Exhibit 7) on June 9, 2025.
9. Mr. Quezada has not bonded the judgment.
10. CPLR 5206(e) provides:

A judgment creditor may commence a special proceeding in the county in which the homestead is located against the judgment debtor for the sale, by a sheriff or receiver, of a homestead exceeding one hundred fifty thousand dollars for the counties of ... Westchester ... The court, if it directs such a sale, shall so marshal the proceeds of the sale that the right and interest of each person in the proceeds shall correspond as nearly as may be to his right and interest in the property sold.

11. Maria accordingly seeks an order providing the following relief:¹
 - That 258 Rumsey Road be sold by the Sheriff of Westchester County in the manner prescribed by law;
 - That the first portion of the sale in an amount not exceeding \$150,000 be paid over to Mr. Quezada based on the homestead exemption;
 - That Maria's judgment against Mr. Quezada, less any amounts paid to date, plus costs and disbursements of this proceeding be adjudged to be a lien upon the surplus; and
 - That the surplus be applied to the judgment obtained by Maria against Mr. Quezada, subject to such other parties having an interest in 258 Rumsey Road in order of their respective priorities and rights in the manner prescribed by law.

¹ Adapted from *Bank of Hope v. Chan*, 2021 WL 2030367 (Sup Ct. N.Y. Co. May 18, 2021).

12. Notice of this petition is being served on Mr. Quezada, in the manner required by CPLR 403(c); and upon all creditors that filed a claim in his bankruptcy case (Exhibit 8) other than herself by certified mail, return receipt requested.

13. No prior request for the relief sought herein was been made to this Court or to any other court.

WHEREFORE, this Court should enter an order granting Maria's CPLR 5206(e) petition and such other and further relief as this Court deems just and proper.

Dated: New York, NY
June 9, 2025

Amini LLC

/s/ Jeffrey Chubak

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VERIFICATION

I, Jeffrey Chubak, an attorney admitted to practice in the courts of New York State, hereby affirms: I am counsel for the petitioner, Maria Jose Pizarro. I have read the foregoing petition and know the contents thereof. The same is true to my knowledge, except as to matters therein stated to be alleged by information and belief and, that as to those matters, I believe them to be true. This verification is made by me and not by Ms. Pizarro, pursuant to CPLR 3020(d)(3), because all the material allegations (except those as to matters of public record) of said petition are within my personal knowledge.

I affirm this 9th day of June, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

/s/ Jeffrey Chubak